JOINT STIPULATION REQUESTING EXTENSION OF TIME TO RESPOND TO THE COMPLAINT;

[PROPOSED] ORDER

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Gordon & Rees LLP

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The instant lawsuit was filed on December 29, 2011. The Summons and Complaint were served on Pandora's agent on February 22, 2012, making Pandora's response due on March 14, 2012. Hartford agreed that Pandora could have until March 21, 2012 to respond to the Complaint.

The parties are actively discussing settlement. This is the parties' first request for an extension. The requested extension (to April 20, 2012) will make it necessary for current dates and deadlines in the case to be altered.

On December 29, 2012, the Court issued an Order Setting Initial Case Management Conference and ADR Deadlines, as follows:

March 21, 2012	Last day to: meet and confer regarding initial disclosures, early settlement, ADR Process selection, and discovery plan; file ADR
	Certification signed by Parties and Counsel; file either Stipulation to ADR Process or notice of Need for ADR Phone Conference.

Last day to: file Rule 26(f) Report; complete initial disclosures or April 4, 2012 state objection under Rule 26(f) Report: and file Case Management Statement.

April 11, 2012 Initial Case Management Conference.

The parties request that this Court extend to April 20, 2012 the date on which Pandora is to respond to the Complaint. The parties further request that the Court's December 29, 2012 Order be vacated, and that the Court reschedule the Initial Case Management Conference date and the initial deadlines in the case.

Dated: March 2012 **GORDON & REES LLP**

Sara M. Thorpe

Geoffrey Hutchinson Attorneys for HARTFORD CASUALTY INSURANCE COMPANY and HARTFORD INSURANCE COMPANY OF THE MIDWEST

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